

TREY A. ROTHELL, ESQ.
Nevada Bar No.: 15993
ARMSTRONG TEASDALE LLP
7160 Rafael Rivera Way, Suite 320
Las Vegas, Nevada 89113
Telephone: 702.678.5070
Facsimile: 702.878.9995
trothell@atlpl.com

Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BROADCAST MUSIC, INC., as agent for
Broadcast Music, LLC; WARNER-
TAMERLANE PUBLISHING CORP.;
UNICHAPPEL MUSIC INC.; SONY/ATV
SONGS LLC d/b/a SONY/ATV ACUFF
ROSE MUSIC; HIP CITY MUSIC INC.; and
HIFROST PUBLISHING,

Plaintiffs,

vs.

PURE MEXICAN GRILL, LLC d/b/a
MARIPOSA COCINA & COCKTAILS;
TONY SAROYA, an individual; YOGENDRA
SOLANKI, an individual; RAJA MITTAL, an
individual, and SURJIT HEERA, an individual,

Defendants.

Case No.: 2:25-cv-00727

COMPLAINT

Plaintiffs Broadcast Music, Inc., as agent for Broadcast Music, LLC, Warner-Tamerlane Publishing Corp., Unichappel Music Inc., Sony/ATV Songs LLC d/b/a Sony/ATV Acuff Rose Music, Hip City Music Inc., and Hifrost Publishing (collectively, "Plaintiffs"), by and through their counsel of record, Armstrong Teasdale LLP, hereby make their Complaint against Defendants Pure Mexican Grill, LLC d/b/a Mariposa Cocina & Cocktails, Tony Saroya, Yogendra Solanki, Raja Mittal, and Surjit Heera (collectively, "Defendants"), and allege as follows (on knowledge as to Plaintiffs; otherwise on information and belief):

JURISDICTION AND VENUE

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2 1. This is a suit for copyright infringement under the United States Copyright Act of
3 1976, as amended, 17 U.S.C. §§ 101, *et seq.* (the “Copyright Act”). This Court has jurisdiction
4 pursuant to 28 U.S.C. § 1338(a).

5 2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(a). The
6 Unofficial Southern Division of this District is the proper venue for this action pursuant to LR IA
7 1-6 and LR IA 1-8(a).

THE PARTIES

8
9 3. Plaintiff Broadcast Music, Inc. (“BMI”), is a corporation organized and existing
10 under the laws of the State of Delaware. BMI’s principal place of business is 7 World Trade Center,
11 250 Greenwich Street, New York, New York 10007. BMI, as agent for Broadcast Music, LLC,
12 has been granted the right to license the public performance rights in 22.4 million copyrighted
13 musical compositions (the “BMI Repertoire”), including those which are alleged herein to have
14 been infringed.

15 4. The Plaintiffs other than BMI are the owners of the copyrights in the musical
16 compositions, which are the subject of this lawsuit. All Plaintiffs are joined pursuant to Fed. R.
17 Civ. P. 17(a) and 19(a).

18 5. Plaintiff Warner-Tamerlane Publishing Corp. is a corporation. This Plaintiff is a
19 copyright owner of at least one of the songs in this matter.

20 6. Plaintiff Unichappell Music Inc. is a corporation. This Plaintiff is a copyright owner
21 of at least one of the songs in this matter.

22 7. Plaintiff Sony/ATV Songs LLC is a limited liability company doing business as
23 Sony/ATV Acuff Rose Music. This Plaintiff is a copyright owner of at least one of the songs in
24 this matter.

25 8. Plaintiff Hip City Music Inc. is a corporation. This Plaintiff is a copyright owner of
26 at least one of the songs in this matter.
27

1 9. Plaintiff Hifrost Publishing is a partnership. This Plaintiff is a copyright owner of
2 at least one of the songs in this matter.

3 10. Defendant Pure Mexican Grill, LLC is a limited liability company organized and
4 existing under the laws of the state of Nevada, which operates, maintains, and controls an
5 establishment known as Mariposa Cocina & Cocktails, located at 2575 S. Decatur Blvd, Las
6 Vegas, NV 89102, in this district (the “Establishment”).

7 11. In connection with the operation of the Establishment, Defendant Pure Mexican
8 Grill, LLC publicly performs musical compositions and/or causes musical compositions to be
9 publicly performed.

10 12. Defendant Pure Mexican Grill, LLC has a direct financial interest in the
11 Establishment.

12 13. Defendant Tony Saroya is a managing member of Defendant Pure Mexican Grill,
13 LLC with responsibility for the operation and management of that limited liability company and
14 the Establishment.

15 14. Defendant Tony Saroya has the right and ability to supervise the activities of
16 Defendant Pure Mexican Grill, LLC and a direct financial interest in that LLC and the
17 Establishment.

18 15. Defendant Yogendra Solanki is a managing member of Defendant Pure Mexican
19 Grill, LLC with responsibility for the operation and management of that limited liability company
20 and the Establishment.

21 16. Defendant Yogendra Solanki has the right and ability to supervise the activities of
22 Defendant Pure Mexican Grill, LLC and a direct financial interest in that LLC and the
23 Establishment.

24 17. Defendant Raja Mittal is a managing member of Defendant Pure Mexican Grill,
25 LLC with responsibility for the operation and management of that limited liability company and
26 the Establishment.

claims of copyright infringement at issue in this action. Each numbered claim has the following eight lines of information (all references to “Lines” are lines on the Schedule): Line 1 providing the claim number; Line 2 listing the title of the musical composition related to that claim; Line 3 identifying the writer(s) of the musical composition; Line 4 identifying the publisher(s) of the musical composition and the plaintiff(s) in this action pursuing the claim at issue; Line 5 providing the date on which the copyright registration was issued for the musical composition; Line 6 indicating the copyright registration number(s) for the musical composition; Line 7 showing the date(s) of infringement; and Line 8 identifying the Establishment where the infringement occurred.

25. For each work identified on the Schedule, the person(s) named on Line 3 was the creator of that musical composition.

26. For each work identified on the Schedule, on or about the date(s) indicated on Line 5, the publisher(s) named on Line 4 (including any predecessors in interest), complied in all respects with the requirements of the Copyright Act and received from the Register of Copyrights Certificates of Registration bearing the number(s) listed on Line 6.

27. For each work identified on the Schedule, on the date(s) listed on Line 7, Plaintiff BMI was (and still is) the licensor of the public performance rights in the musical composition identified on Line 2. For each work identified on the Schedule, on the date(s) listed on Line 7, the Plaintiff(s) listed on Line 4 was (and still is) the owner of the copyright in the respective musical composition listed on Line 2.

28. For each work identified on the Schedule, on the date(s) listed on Line 7, Defendants publicly performed and/or caused to be publicly performed at the Establishment the musical composition identified on Line 2 without a license or permission to do so. Thus, Defendants have committed copyright infringement.

29. The specific acts of copyright infringement alleged in the Complaint, as well as Defendants’ entire course of conduct, have caused and are causing Plaintiffs great and incalculable damage. By continuing to provide unauthorized public performances of works in the BMI Repertoire at the Establishment, Defendants threaten to continue committing copyright

1 infringement. Unless this Court restrains Defendants from committing further acts of copyright
2 infringement, Plaintiffs will suffer irreparable injury for which they have no adequate remedy at
3 law.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs pray that:

6 A. Defendants, their agents, servants, employees, and all persons acting under their
7 permission and authority, be enjoined and restrained from infringing, in any manner, the
8 copyrighted musical compositions licensed by BMI, pursuant to 17 U.S.C. § 502;

9 B. Defendants be ordered to pay statutory damages, pursuant to 17 U.S.C. § 504(c);

10 C. Defendants be ordered to pay costs, including reasonable attorneys' fees, pursuant
11 to 17 U.S.C. § 505; and

12 D. Plaintiffs have such other and further relief as is just and equitable.

13
14 Dated: April 25, 2025.

ARMSTRONG TEASDALE LLP

15 By: /s/ Trey A. Rothell

16 TREY A. ROTHELL, ESQ.

17 Nevada Bar No.: 15993

7160 Rafael Rivera Way, Suite 320

18 Las Vegas, Nevada 89113

19 *Attorney for Plaintiffs*
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